UNITED STATES DISTRICT COURT

For the DISTRICT OF NEBRASKA

U.S. DISTRICT COURT DISTRICT OF NEBRASKA

| | 2012 304 50 LU A: A |
|----------------------|---|
| Cara Ryan, | Case No. 8; 19W28 OFFICE OF THE CLERK NOTICE OF REMOVAL OF ACTION |
| Plaintiff, | NOTICE OF REMOVAL OF ACTION UNDER 28 U.S.C. §1441 - FEDERAL |
| vs. | QUESTION |
| William P. Drucklieb | } |
| Defendant, | } |
| | |
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TO THE CLERK OF THE ABOVE-ENTITLED COURT:

PLEASE TAKE NOTICE that defendant(s) WILLIAM P. DRUCKLIEB hereby removes to this Court the state court action described below.

- 1. Action commenced in the **DISTRICT COURT of the State of Nebraska** in and for the **County of Sarpy** entitled **CARA RYAN**, vs. **WILLIAM P. DRUCKLIEB**, as case number **CI 19-833** papers attached hereto as Exhibit "A" and incorporated herein by reference.
- 2. This action is a civil action of which this Court has original jurisdiction under 28 U.S.C. §1331, and is one which may be removed to this Court by defendant(s) pursuant to the provisions of 28 U.S.C. §1441(a) in that it arises under the Equal Protection Clause of the 14th Amendment of the United States Constitution, Section 504 of the Rehabilitation Act of 1973, the Americans with Disabilities Act of 1990, and the Age Discrimination Act of 1975.

3. Joinder to Case Number

of this Court pursuant to the

Entire Controversy Doctrine.

4. The undersigned defendant(s) are/is the only named defendant in the state court action referenced above in paragraph 1 of this notice.

DATED: June 26, 2019

William P. Drucklieb, Defendant

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Exhibit A

IN THE DISTRICT COURT OF SARPY COUNTY, NEBRASKA

| Cara Ryan, |) | CI 19-833 |
|--------------------|---|-------------------|
| Petitioner, |) | |
| Vs. |) | ORDER FOR HEARING |
| William Drucklieb, |) | |
| Respondent. |) | |

IT IS ORDERED that a hearing on this matter will be held on June 4, 2019, at 1:30pm. in courtroom #2, Sarpy County Courthouse, Papillion, Nebraska, to provide the respondent an opportunity to appear and show cause why the requested protection order should not be issued, modified, or remain in effect. Any protection order previously issued shall remain in effect until the date that the hearing is actually held.

IT IS FURTHER ORDERED that a copy of this order shall be mailed to both the petitioner and respondent at their respective addresses.

NOTICE TO PETITIONER: You must appear at the place, date and time shown to show cause why your protection order should be issued, modified, or remain in effect.

DATED AND ENTERED on May 7, 2019.

Hon. Tricia A. Freeman County Court Judge

County Co

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IN THE DISTRICT COURT OF SARPY COUNTY, NEBRASKA

Cara Ryan v. William Drucklieb

Printed on 6/04/2019 at 2:16

Room 59D02

Case ID: CI 19

833

Page Decision Date 6/04/2019

APPEARANCES

Judge

PaTricia A Freeman

Appeared

Petitioner

Cara Ryan

Appeared

Counsel

Daniel A Christensen

Appeared

Petitioner

Barbara Drucklieb Lemke

Did NOT Appear

Respondent

William Drucklieb

Appeared

Cara Ryan was sworn and testified.

William Drucklieb was sworn and testified.

EXHIBITS

1 OFRD RCVD Doctor Letter

NOTICE OF HEARINGS

Case continued to $\underline{7/03/2019}$ at $\underline{2:30~PM}$ on motion of Defense

in County Courtroom 02 for Hearing - Respondent's Request for Hearing

ADDITIONAL ENTRIES OF RECORD

Petitioner's Motion to Quash is Under Advisement until next hearing.

Petitioner's Motion to Modify is withdrawn.

IT IS SO ORDERED.

Hon.

PaTricia A Freeman

04/2019 Date

ape Nos. 2019 Digital Recording

William Drucklieb 1201 Fort Crook Rd Unit J Bellevue, NE 68005

FILED BY Clerk of the Sarpy District Court 06/04/2019

IN THE DISTRICT COURT OF SARPY COUNTY, NEBRASKA

| CARA RYAN, |) Case No. CI19-833 |
|--------------------|-------------------------|
| Plaintiff, |) |
| v. |) APPEARANCE OF COUNSEL |
| WILLIAM DRUCKLIEB, |) |
| Defendant. |) |

COMES NOW the undersigned, and hereby enters his appearance as attorney for the Plaintiff, Cara Ryan, in the above-captioned matter.

DATED this 21st day of June, 2019.

CARA RYAN, Plaintiff,

By: /s/ Thomas M. Houston
Thomas M. Houston, #18581
BERKSHIRE & BURMEISTER
1301 S. 75th St., Suite 100
Omaha, NE 68124
402/827-7000
402/827-7001 fax
thouston@berkshire-law.com
ATTORNEYS FOR PLAINTIFF

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing Appearance of Counsel was mailed this 21st day of June, 2019, to Defendant, William Drucklieb, at 1201 Ft. Crook #J, Bellevue, NE 68005, by depositing same in the United States mail, postage prepaid.

/s/ Thomas M. Houston